

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Floyd Little, et al. v. National Football League, et al. (Plaintiff Thomas Hendricks ONLY)

Court File No. 2:12-cv-2219-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF THOMAS  
HENDRICKS**

Charles S. Zimmerman, J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiff's Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Thomas Hendricks only in this action, and state as follows:

1. Plaintiff's counsel filed the action *Floyd Little, et al. v. National Football League, et al.*, No. 2:12-cv-2219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including Thomas Hendricks.
2. Plaintiff's counsel filed a short form complaint for Thomas Hendricks on July 13, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Thomas Hendricks and the undersigned.

4. Plaintiff's counsel properly notified Thomas Hendricks of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiff's counsel respectfully requests this Court for leave to withdraw as counsel for Thomas Hendricks only in Court File No. 2:12-cv-2219-AB.

Dated: February 25, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

---

Charles S. Zimmerman (#120054)  
J. Gordon Rudd, Jr. (#222082)  
Brian C. Gudmundson (#336695)  
Michael J. Laird (#0398436)  
1100 IDS Center, 80 South 8th Street  
Minneapolis, MN 55402  
Telephone: (612) 341-0400  
Facsimile: (612) 341-0844  
[Charles.Zimmerman@zimmreed.com](mailto:Charles.Zimmerman@zimmreed.com)  
[Gordon.Rudd@zimmreed.com](mailto:Gordon.Rudd@zimmreed.com)  
[Brian.Gudmundson@zimmreed.com](mailto:Brian.Gudmundson@zimmreed.com)  
[Michael.Laird@zimmreed.com](mailto:Michael.Laird@zimmreed.com)